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September 26, 2017

VIA ECF

The Honorable Esther Salas, U.S.D.J.
United States District Court, District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

**Re: *WAG Acquisition L.L.C. v. MultiMedia, LLC, et al. (14-cv-02340);*
 WAG Acquisition L.L.C. v. WMM LLC, et al. (14-cv-02345);
 WAG Acquisition L.L.C. v. Flying Crocodile, Inc., et al. (14-cv-02674);
 WAG Acquisition L.L.C. v. Gatty Group S.a.r.l, et al. (14-cv-02832);
 WAG Acquisition L.L.C. v. FriendFinder Networks Inc., et al. (14-cv-03456);
 WAG Acquisition L.L.C. v. Vubeology, Inc., et al. (14-cv-04531); and
 *WAG Acquisition L.L.C. v. WebPower, Inc., et al. (15-cv-03581)***

Dear Judge Salas:

This Firm represents the above-named Defendants.

Recently-completed fact discovery has revealed defects in plaintiff WAG Acquisition L.L.C.'s ("WAG") standing that deprive this Court of subject matter jurisdiction. Woodsford Litigation Funding Limited and Woodsford Litigation Funding (US) ("Woodsford") are funding WAG's participation in the above actions. In exchange, WAG has ceded to Woodsford substantial rights in the patents-in-suit such that WAG lacks constitutional standing to sue; or at the very least, WAG lacks prudential standing to sue without joining Woodsford.

Defendants are not seeking to bring a Rule 12(b)(1) motion at this time, because of the already pending motions to dismiss or transfer for improper venue, and the Court's recent stay of all *Markman* briefing (Dkt. Nos. 153 and 159, respectively, in 14-cv-02340).

However, Defendants expressly reserve the right to bring such motion in the future, including in any transferee forum.

We thank the Court for its time and consideration of this submission.

Respectfully,

s/ Justin T. Quinn
Justin T. Quinn

cc: All counsel of record (via ECF)